

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

KATHLEEN WILLIAMS,	)	
	)	
Plaintiff,	)	No. 07 C 6997
	)	
v.	)	Judge Lindberg
	)	
BOARD OF EDUCATION OF THE CITY OF	)	Magistrate Schenkier
CHICAGO and CHRISTINE MUNNS,	)	
INDIVIDUALLY AND AS AN AGENT OF	)	
DEFENDANT BOARD	)	
	)	
Defendants.	)	

**DEFENDANTS' UNCONTESTED MOTION FOR  
ENTRY OF AGREED PROTECTIVE ORDER**

The Board of Education of the City of Chicago ("Board"), and Christine Munns ("Munns") through counsel, pursuant to Fed. R. Civ. P. 26(c) and the Illinois School Student Records Act, 105 ILCS 10/1 *et seq.*, move this court for the entry of a protective order, a proposed draft of which is being submitted to the court via electronic mail, pursuant to the court's standing order. In support of the motion, the Board states:

1. This suit arises from the termination of Plaintiff's employment as a teacher, allegedly motivated by disclosure of Plaintiff's pregnancy.
2. For purposes of discovery, Plaintiff has propounded deposition questions concerning certain confidential information, including employee evaluation, personnel, and disciplinary records and certain student records of students at Sauganash School that are deemed protected from disclosure pursuant to the Illinois School Student Records Act, 105 ILCS 10/1 *et seq.*, and 820 ILCS 40/7, the Personnel Record Review Act.
3. Pursuant to 105 ILCS 10/6(a)(5) the Board may release the student

information, and pursuant to 820 ILCS 40/7(3)(b) the Board may release employee information upon questions proposed by Plaintiffs - if ordered by a court.

4. Plaintiff, through counsel, has represented to Board counsel that her request for the confidential information is legitimate and not being made for any improper purpose.

5. Plaintiff's counsel has represented to Board counsel that she does not oppose the terms of the draft protective order.

WHEREFORE, the Board and Munns respectfully request that this court enter a protective order on such terms as this court deems just to govern the disclosure of said and other confidential documents, and for such further relief as this court deems just.

Respectfully submitted,

PATRICK J. ROCKS  
General Counsel

By: s/James J. Seaberry  
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**CERTIFICATE OF SERVICE**

I, James J. Seaberry, certify that I caused the attached Uncontested Motion for Entry of Agreed Protective Order to be served upon counsel of record via CM-ECF E-Filing pursuant to General Order on Electronic Case Filing, Section XI(C), on July 31, 2008.

s/ James J. Seaberry